

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,)	
)	
Plaintiff,)	
)	
v.)	No. 3:18-cv-00017-NKM-JCH
)	
ALEXANDER E. (ALEX) JONES, <i>et al.</i> ,)	
)	
Defendants.)	
)	

[PROPOSED] SCHEDULING ORDER

WHEREAS, the Court extended the deadline to complete fact discovery in the above-captioned matter to February 14, 2022 for the limited purpose of obtaining responses to outstanding discovery requests and completing deposition practice (D.I. 464)¹, and set a trial date for January 17-20 and January 23-27, 2023 (D.I. 467).

WHEREAS, the Court requested that the parties propose a case schedule consistent with the January 2023 trial date.

WHEREAS, the Parties agree to further extend the deadline for the limited purpose of obtaining responses to outstanding discovery requests and completing deposition practice to April 11, 2022.

NOW, the parties come jointly before this Court to submit the following amended proposed schedule for deadlines that shall control the remainder of this action.

¹ D.I. 464 extends the deadline for the limited purpose of obtaining outstanding responses to outstanding discovery requests and completing deposition practice to February 12, 2022, which is a Saturday. The parties agree that the current deadline is Monday, February 14.

Event	Proposed Dates
Deadline to complete fact discovery	April 11, 2022
Potential settlement / ADR discussion	April 18, 2022
Fed. R. Civ. P. 26(a)(2)(B) opening expert reports	April 25, 2022
Fed. R. Civ. P. 26(a)(2)(B) responsive expert reports	May 20, 2022
Fed. R. Civ. P. 26(a)(2)(B) reply expert reports (limited to subject matter first raised in responsive reports)	June 10, 2022
Deadline to complete all discovery, including expert depositions.	June 27, 2022
Deadline to file dispositive motions	August 5, 2022
Deadline to file oppositions to dispositive motions	September 13, 2022
Deadline to file replies to dispositive motions	October 14, 2022
Deadline for hearing dispositive motions	TBD by the Court
Exchange list of witnesses expected to be called at trial	November 11, 2022
Deadline for filing motions <i>in limine</i> (copies to opposing counsel)	December 2, 2022
Deadline for filing oppositions to motions <i>in limine</i> (copies to opposing counsel)	December 21, 2022
Deadline for filing proposed jury instructions and special interrogatories (copies to opposing counsel)	January 10, 2023

Event	Proposed Dates
<p>Deadline for filing joint pretrial order including:</p> <ul style="list-style-type: none"> • any contested issues of law that require a ruling before trial; • the essential elements that a party must prove to establish any meritorious claims remaining for adjudication, and the damages or other relief sought; • the essential elements that a party must prove to establish any meritorious defenses; • the material facts and theories of liability or defense; • the issues of fact contested by each party; • any contested issues of law that do not require a ruling before trial; • any stipulations; and • any special voir dire questions <p>**Disputed sections to be filed as separate addendum**</p>	<p>January 10, 2023</p>
Pretrial conference	TBD by the Court
Trial	January 17-20 and January 23-27, 2023

SO ORDERED: _____

By: _____
The Honorable Joel C. Hoppe

Dated: February 2, 2022

Respectfully Submitted,

By: /s/ Anwar L. Graves
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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of February 2022, a copy of the Proposed Scheduling Order was served on all parties via the Court's Electronic Case Filing system, and separately sent via electronic mail to Mr. Lee Stranahan and Mr. R. Scott Creighton.

/s/ Anwar L. Graves

Anwar L. Graves